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May 1, 2012

Honorable Judge Rebecca R. Pallmeyer
U.S. District Court for the
Northern District of Illinois
Dirksen Building, Courtroom 1046
United States Courthouse
219 South Dearborn Street
Chicago, Illinois 60604

Re: *In Re: Zimmer NexGen Knee Implant Products Liability Litigation*
Case No. 1:11-CV-05468

Dear Judge Pallmeyer:

Case Management Order No. 3 indicates that the parties will submit an Agreed Electronically Stored Information (ESI) and Custodial Production Protocol on or before April 30, 2012. The parties have exchanged proposed protocols, and we continue to meet and confer on an agreed protocol. The parties jointly request leave to file an agreed protocol or, in the alternative, separate protocols on or before May 14, 2012.

Thank you for your consideration.

Very truly yours,

FAEGRE BAKER DANIELS LLP

JOHNSON BECKER, PLLC

/s/ J. Stephen Bennett
J. Stephen Bennett, Esq.

/s/ Timothy J. Becker
Timothy J. Becker, Esq.

JSB:skr

cc: Jay Yeager
Abigail Butler
Tobias Millrood